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6 Attorneys for Plaintiff SYNOPSYS, INC.  
7 and for Defendants AEROFLEX INCORPORATED,  
8 AMI SEMICONDUCTOR, INC., MATROX  
9 ELECTRONIC SYSTEMS, LTD., MATROX  
GRAPHICS, INC., MATROX INTERNATIONAL  
CORP., MATROX TECH, INC., and  
AEROFLEX COLORADO SPRINGS, INC.

UNITED STATES DISTRICT COURT

**NORTHERN DISTRICT OF CALIFORNIA**

## SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,

Case No. C03-04669 MJJ (EMC)

Plaintiff,

Case No. C03-02289 MJJ (EMC)

VS.

16 AEROFLEX INCORPORATED, AMI  
17 SEMICONDUCTOR, INC., MATROX  
18 ELECTRONIC SYSTEMS LTD., MATROX  
GRAPHICS INC., MATROX INTERNATIONAL  
CORP., MATROX TECH, INC., AND  
AEROFLEX COLORADO SPRINGS, INC.

**DECLARATION OF DAVID CHIAPPINI IN  
SUPPORT OF DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT REGARDING THE  
SCOPE OF PATENT DAMAGES FOR  
ALLEGED INFRINGEMENT OF U.S.  
PATENT NO. 4,922,432**

FILED UNDER SEAL

## Defendants.

Date: September 26, 2006

Date: September  
Time: 9:30 a.m.

Courtroom: 11, 19th Floor

Judge: Martin J. Jenkins

## SYNOPSYS, INC.,

**Plaintiff,**

VS.

RICOH COMPANY, LTD.,

**Defendant.**

**CONFIDENTIAL FILED UNDER SEAL  
PURSUANT TO PROTECTIVE ORDER**

1 I, David Chiappini, declare as follows:

2       1. I am Project Director at Matrox Graphics ("Matrox"). I make this declaration of my  
3 personal knowledge, and if called as a witness, I could and would testify competently to the statements  
4 contained herein.

5        2. I have been employed by Matrox since 1994 and I have been in my current position since  
6 2002. My general duties include supervising and managing the ASIC Group and all resources related  
7 thereto as well as foreseeing the ASIC development and tapeout on schedule. My general duties also  
8 require me to understand customer needs and demands regarding Matrox's products including graphic  
9 boards.

10       3. Matrox's use of the Synopsys Design Compiler system for logic synthesis is just one of at  
11 least 20 steps that must occur in order to create an ASIC. Matrox does not usually sell ASICs directly to its  
12 customers; Matrox sells graphics boards that have multiple components including an ASIC chip.

13       4.     Generally, the cost of an ASIC ranges from \$20 to \$50, and the cost of the graphics boards  
14 that Matrox sells, ranges from hundreds of dollars to several thousands of dollars.

15        5. Matrox's use of the Synopsys Design Compiler system for logic synthesis to design an  
16 ASIC does not form the basis for customer demand for Matrox's graphics boards.

18 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
19 is true and correct. This declaration was executed at Dorval, Quebec, Canada, on August 18, 2006.

By:

David Chiappini